



MONTGOMERY McCracken

ATTORNEYS AT LAW

Vincent M. DeOrchis

Admitted in New York

437 Madison Avenue

New York, NY 10022

Tel: 212-867-9500

Direct Dial:

212-551-7730

Fax:

212-599-5085

Email:

vdeorchis@mmwr.com

July 27, 2021

VIA ECF

Honorable Judge John G. Koeltl
United States District Court
Southern District of New York

Re: Air Express International USA, Inc. v. ZIM Integrated Shipping
Services Ltd. et al.
USDC - SDNY21-cv-03308

*Conference on 8/9/21 is canceled.
Parties should provide a Rule 26 (F)
Report by 8/23/21.
So ordered.
per G/K Koeltl
7/27/21 U.S.D.S.*

Dear Honorable Judge Koeltl:

We have been recently appointed to represent defendants ZIM Integrated Shipping Services Ltd. and ZIM American Integrated Shipping Services Company, LLC (collectively "ZIM") in the above captioned litigation. On July 16, 2021 we have entered into a stipulation with counsel for Plaintiff extending ZIM's time to answer or otherwise move with respect to the complaint up and including August 16, 2021 [Dckt. No. 13]. The extension is necessary so that we can work with our client and gather the relevant documentation on the matter and familiarize with same.

The parties further note that the initial pretrial conference in this matter is currently scheduled before your Honor on August 9, 2021. Counsel for the parties believe that the conference would be more effective if held after defendant had some time to review and study the file and answered the complaint. Therefore, we write jointly with counsel for Plaintiff to respectfully request a 30 days adjournment of the initial pretrial conference. The parties note that this is the second request for and adjournment of the initial pretrial conference. The first adjournment was requested by plaintiffs to allow to serve ZIM. We thank your Honor for his attention to this matter.

Respectfully submitted,

/s/ Vincent M. DeOrchis

Vincent M. DeOrchis

**USDS SDNY
DOCUMENT
ELECTRONICALLY FILED**

VMD:11

5585848

DOC #: _____
DATE FILED: 7/27/2021

MONTGOMERY McCracken WALKER & RHOADS LLP

PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
JOHN J. LEVY, NEW JERSEY RESPONSIBLE PARTNER